

STEVEN H. ROSENBAUM  
 R. TAMAR HAGLER, Bar No. 189441  
 NANCY F. LANGWORTHY  
 Nancy.Langworthy@usdoj.gov  
 ERIN MEEHAN RICHMOND  
 United States Department of Justice  
 950 Pennsylvania Avenue, N.W. – G Street  
 Washington, D.C. 20530  
 Telephone: (202) 616-8925

ANDRE BIROTTE JR.  
 LEON W. WEIDMAN, Bar No. 104078  
 ROBYN-MARIE LYON MONTELEONE, Bar No. 130005  
 Robby.Monteleone@usdoj.gov  
 United States Attorney's Office, Central District of California  
 Room 7516 Federal Building  
 300 North Los Angeles Street  
 Los Angeles, CA 90012  
 Telephone: (213) 894-2458  
*Attorneys for Plaintiff United States of America*

CHRISTOPHER BRANCART, Bar No. 128475  
 cbrancart@brancart.com  
 ELIZABETH BRANCART, Bar. No. 122092)  
 BRANCART & BRANCART  
 Post Office Box 686  
 Pescadero, CA 94060  
 Telephone: (650) 879-0141  
*Attorneys for Plaintiffs Rajeeyah Bilal-Varney, et al.*

RICHARD T. EGGER, Bar No. 162581  
 LAURA L. CRANE, Bar No. 238246  
 Laura.Crane@bbklaw.com  
 VALERIE D. ESCALANTE, Bar No. 281386  
 BEST BEST & KRIEGER LLP  
 2855 East Guasti Road, Suite 400  
 Ontario, CA 91761  
 Telephone: (909) 989-8584  
*Attorneys for Defendant City of San Jacinto*

UNITED STATES DISTRICT COURT  
 CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
 Plaintiff,  
  
 v.  
 CITY OF SAN JACINTO, CALIFORNIA,  
  
 Defendant.

Case No. 5:12-cv-01966-TJH(DTBx)  
 Consolidated with Case No.  
 ED CV 12-02191-TJH (DTBx)

**JOINT STIPULATION RE  
 CONTINUANCE OF FINAL  
 PRETRIAL CONFERENCE DATE**

1 RAJEEYAH BILAL-VARNEY, YVONNE  
2 CARTER, AURORA BELTRAN, and  
3 DEIRDRA HAMPTON,

4 Plaintiffs,

5 v.

6 CITY OF SAN JACINTO, CALIFORNIA,

7 Defendant.  
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**JOINT STIPULATION RE CONTINUANCE OF FINAL PRETRIAL  
CONFERENCE DATE**

On February 22, 2013, the Court entered an Order setting the Final Pretrial Conference in the above-entitled case *Rajeeyah Bilal-Varney, et al. v. City of San Jacinto* for June 10, 2013 at 10:00 a.m. (Docket No. 17). On February 26, 2013, the Court entered an Order setting the Final Pretrial Conference in the above-entitled case *United States of America v. City of San Jacinto* for June 10, 2013 at 10:00 a.m. (Docket No. 11). That same day, the Court entered an Order consolidating these cases for all purposes, except for trial. (Docket No. 18 (Private Plaintiffs' case); Docket No. 14 (U.S.A.'s case)).

Counsel for the Parties, having discussed the scope of this action and having filed their Joint Report pursuant to Federal Rule of Civil Procedure 26 (f) (Docket No. 20), believe that this litigation involves a wide breadth of matters to be covered by discovery, motion practice, and pre-trial work, *i.e.*, number of potential witnesses, the extended years covered by the complaint, and the volume of documents to be reviewed.

Consequently, the Counsel for the Parties believe that efficiency would best be served if the Final Pretrial Conference date were to be extended from June 10, 2013 to July 30, 2014. Included within the Parties' Joint Report, the Parties submitted a proposed schedule for discovery, settlement/mediation, dispositive motions, and trial. The Parties are operating under this proposed schedule:

Complete initial written discovery by	May 31, 2013
Conduct informal settlement discussion on or before	June 14, 2013
Conduct lay depositions	June – December 2013
Conduct private mediation by	October 2013
Exchange expert reports by	January 13, 2014
Exchange rebuttal expert reports by	March 14, 2014
Conduct expert depositions	February – April 2014

Discovery cut-off	April 30, 2014
Dispositive motion filing cut-off	May 30, 2014
Dispositive motion hearing cut-off	July 1, 2014
Pretrial conference	July 30, 2014
Trial	September 2014

*See* Joint Report, p. 3. Granting an extension of the Final Pretrial Conference date would ensure that the Parties complete all discovery, motion practice, and pretrial work in advance of the Final Pretrial Conference.

Accordingly, the Parties stipulate, and respectfully request, that the Court enter an Order continuing the Final Pretrial Conference date from June 10, 2013 to July 30, 2014, or to a date thereafter better suited for the Court.

**SO STIPULATED AND AGREED.**

Pursuant to Local Rule 5-4.3.4, by my signature below I, Valerie D. Escalante, attest that all other signatories concur in this filing's content and have authorized this filing.

Dated: May 9, 2013                      BEST BEST & KRIEGER LLP

By: /s/ Valerie D. Escalante  
 RICHARD T. EGGER  
 JEFFREY S. BALLINGER  
 LAURA L. CRANE  
 VALERIE D. ESCALANTE  
*Attorneys for Defendant San Jacinto, California*

1 Dated: May 9, 2013

UNITED STATES DEPARTMENT OF JUSTICE  
AND UNITED STATES ATTORNEY'S OFFICE

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4 By: /s/ Nancy F. Langworthy

STEVEN H. ROSENBAUM

R. TAMAR HAGLER

NANCY F. LANGWORTHY

ERIN MEEHAN RICHMOND

United States Department of Justice

ANDRE BIROTTE, JR.

LEON W. WEIDMAN

ROBYN-MARIE LYON MONTELEONE

United States Attorney's Office

*Attorneys for Plaintiff United States of  
America*

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10 Dated: May 9, 2013

BRANCART & BRANCART

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13 By: /s/ Elizabeth Brancart

CHRISTOPHER BRANCART

ELIZABETH BRANCART

*Attorneys for Plaintiffs Rajeeyah Bilal-Varney,  
et al.*